

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

CHRISTY HALL : **CASE NO.: 3:21-CV-00001**
VERSUS : **JUDGE TERRY A. DOUGHTY**
OUTBACK STEAKHOUSE OF : **MAG. JUDGE KAYLA D. MCCLUSKY**
FLORIDA, LLC

MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO LIABILITY

NOW INTO COURT, through undersigned counsel, comes Plaintiff, CHRISTY HALL, who respectfully submits that she is entitled to partial summary judgment as to liability for the reasons set forth hereafter:

1.

This case arises out of a slip and fall accident which happened at the Outback Steakhouse restaurant at 305 West Constitution in West Monroe, Louisiana.

2.

Plaintiff, CHRISTY HALL (“plaintiff”), slipped and fell on spilled water near the front of the Outback Steakhouse restaurant.

3.

As set forth more fully in plaintiff’s deposition testimony and in the memorandum attached hereto, plaintiff can establish all elements of La. R.S. 9:2800.6.

4.

Thus, plaintiff can satisfy her burden of proof as a matter of law and is entitled to partial summary judgment as to liability.

WHEREFORE, Plaintiff, CHRISTY HALL, respectfully prays that her motion for partial summary judgment as to liability be granted.

Monroe, Louisiana this 6th day of September, 2021.

Respectfully submitted,

PARKER ALEXANDER, LLC

/s/ Chad C. Carter

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of September, 2021, a copy of the foregoing pleading was filed electronically with the Clerk of Court using CM/ECF system. Notice of this filing will be sent to counsel for all parties to this proceeding by operation of the court's electronic filing system.

/s/ Chad C. Carter

CHAD C. CARTER